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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CHERYL HOWELL, an individual,

Plaintiff,

vs.

WILCAC LIFE INSURANCE COMPANY, a
foreign corporation; WASHINGTON
NATIONAL INSURANCE COMPANY, a
foreign corporation; and ABC
CORPORATIONS A-Z,

Defendants.

CASE NO. 2:24-cv-02039-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES**

(FIRST REQUEST)

Plaintiff, CHERYL HOWELL, by and through her attorneys of record, LEVERTY & ASSOCIATES LAW CHTD., and Defendants, WILCAC LIFE INSURANCE COMPANY and WASHINGTON NATIONAL INSURANCE COMPANY, by and through their attorneys of record, CLARK HILL PLC and S.K. HUFFER & ASSOCIATES, P.C. hereby stipulate to extend the scheduled deadlines and seek this Honorable Court's order in accordance with the following terms, pursuant to LR 26-3. This is the first stipulation to extend time to take discovery.

DISCOVERY COMPLETED

To date the parties in this action have conducted discovery as follows:

1. The parties conducted their Early Case Conference pursuant to FRCP 26(f).
2. On December 5, 2024, the parties filed their Proposed Discovery Plan and Scheduling Order (ECF No. 17).

1 3. On December 5, 2024, the Court issued the Discovery Plan & Scheduling Order
2 (ECF No. 18).

3 4. On December 6, 2024, the Defendants served its First Set of Interrogatories to
4 Plaintiff and First Set of Requests for Production to Plaintiff.

5 5. On December 18, 2024, Plaintiff served her First Set of Interrogatories to
6 Defendant Washington National Insurance Company and her First Set of Requests for Production
7 to Defendant Washington National Insurance Company.

8 6. On December 18, 2024, Plaintiff served her First Set of Interrogatories to
9 Defendant WILCAC Life Insurance Company and her First Set of Requests for Production to
10 Defendant WILCAC Life Insurance Company.

11 7. On December 19, 2024, Defendants made their Fed. R. Civ. Pro. 26(f) initial
12 disclosures.

13 8. On December 19, 2024, Plaintiff made her Fed. R. Civ. Pro. 26(f) initial
14 disclosures.

15 9. On January 28, 2024, Plaintiff Cheryl Howell served her responses and objections
16 to Defendants First Set of Interrogatories and the First Set of Requests for Production.

17 10. Plaintiff provided signed releases to Defendants to obtain medical records.

18 11. On February 4, 2025, Plaintiff served her First Supplement Disclosure pursuant to
19 Fed. R. Civ. Pro. 26(f).

20 12. On February 7, 2025, Defendant WILCAC Life Insurance Company served its
21 responses and objections Plaintiff's First Set of Interrogatories and the First Set of Requests for
22 Production.

23 13. On February 7, 2025, Defendant Washington National Insurance Company served
24 its responses and objections Plaintiff's First Set of Interrogatories and the First Set of Requests for
25 Production.

26 14. On March 6, 2024, Plaintiff served Fed. R. Civ. Pro. 30(b)(6) deposition notices to
27 Defendant WILCAC Life Insurance Company and Defendant Washington National Insurance
28 Company.

15. On March 12, 2024, Defendant provided additional documents it had obtained via the signed releases to Plaintiff.

DISCOVERY THAT REMAINS TO BE COMPLETED

1. Depositions of Corporate Representatives of Defendant WILCAC Life Insurance Company.
2. Depositions of Corporate Representatives of Defendant Washington National Insurance,
3. Deposition of Plaintiff.
4. Potential third party discovery.
5. Disclosure and depositions of experts.

REASONS FOR REQUESTING AN EXTENSION OF DEADLINES

The parties have participated in extensive written discovery as detailed above. The parties have not yet commenced depositions, but Plaintiff has provided Fed. R. Civ. Pro. 30(b)(6) deposition notices to Defendant WILCAC Life Insurance Company and Defendant Washington National Insurance Company. Defendants are determining which employees to designate to testify as to the deposition topics noticed and ascertaining their availability. The parties are working diligently to set the Fed. R. Civ. Pro. 30(b)(6) depositions, but more time is needed to complete these depositions, and the completion of these depositions will not be possible before the current expert disclosure deadline. The parties believe a sixty (60) day extension of discovery deadlines is necessary to complete non-expert depositions prior to expert disclosures. Accordingly, the parties request all deadlines be extended sixty (60) days.

CURRENT SCHEDULE TO COMPLETE REMAINING DISCOVERY

Discovery Cutoff:	Tuesday, June 3, 2025
Initial Expert Disclosures:	Friday, April 4, 2025
Rebuttal Expert Disclosures:	Friday, May 2, 2025
Dispositive Motions:	Thursday, July 3, 2025
Pre-Trial Order	Friday, August 1, 2025
Fed R. Civ. Pro. 26(a)(3) Disclosures	Friday, August 1, 2025

PROPOSED SCHEDULE TO COMPLETE REMAINING DISCOVERY

Discovery Cutoff:	Monday, August 4, 2025
Initial Expert Disclosures:	Tuesday, June 3, 2025
Rebuttal Expert Disclosures:	Tuesday, July 1, 2025
Dispositive Motions:	Monday, September 1, 2025
Pre-Trial Order	Tuesday, September 30, 2025
Fed R. Civ. Pro. 26(a)(3) Disclosures	Tuesday, September 30, 2025

DATED: This 14th day of March 2025.

DATED: This 14th day of March 2025.

LEVERTY & ASSOCIATES LAW CHTD.

CLARK HILL PLC

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: March 14, 2025